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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA, ) No. 3-12-70315 NC  
Plaintiff, ) STIPULATION AND [PROPOSED]  
v. ) ORDER TO CONTINUE AND EXCLUDE  
FELIX EFRAIN CHAVEZ, AND ) TIME UNDER S.T.A. AND F.R.C.R.P. 5.1  
DOUGLAS GALVAN, ) Date: July 19, 2013 to July 30, 2013  
Defendant. ) Time: 9:30 a.m.

The parties are currently scheduled to appear before the Court on July 19, 2013 for status.

As of July 17, 2013, the parties reached an agreement that would resolve this matter as to both defendants. However, because the agreement was reached only two days before the next scheduled appearance, the parties will not be prepared to enter pleas on July 19, 2013.

The parties therefore request that this matter be continued for roughly one week, until July 30, 2013 for arraignment on an information before this Court. Depending on the practice of the District Court Judge assigned to this matter, the defendants will also be prepared to enter changes of plea on July 30, 2013. Courtesy copies of proposed plea agreements as to each defendant have therefore been provided to the Court.

STIP. & [PROP.] ORD. TO CONTINUE & EXCL. TIME  
U.S. v. CHAVEZ & GALVAN: 3-12-70315 NC]

1       The parties hereby stipulate that the time between July 19, 2013 and July 30, 2013 is  
2 appropriately excluded from the running of the speedy trial clock under 18 U.S.C. 3161(h)(1)(G)  
3 as plea agreements have been submitted for the Court's consideration. The parties further  
4 stipulate that this time period shall be excluded from the applicable deadlines under F.R.Cr.P. 5.1  
5 with each defendant's consent and for good cause.

6 SO STIPULATED.

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8 DATED: July 18, 2013.

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Respectfully submitted,  
MELINDA HAAG  
United States Attorney

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/s/

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BENJAMIN TOLKOFF  
Assistant United States Attorney

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DATED: July 18, 2013.

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/s/

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DATED: July 18, 2013.

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SARA REIF  
Attorney for FELIX EFRAIN CHAVEZ

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/s/

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LAUREL HEADLEY  
Attorney for DOUGLAS GALVAN

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For the reasons stated, for good cause shown and because the Court has taken proposed  
plea agreements under consideration, this matter is hereby continued until July 30, 2013 and all  
time between July 19, 2013 and July 30, 2013 is excluded from the running of the speedy trial  
clock and the applicable time limits of F.R.Cr.P. 5.1.

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SO ORDERED.

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DATED: July 18, 2013.

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HONORABLE KANDIS A. WESTMORE  
United States Magistrate Judge

STIP. & [PROP.] ORD. TO CONTINUE & EXCL. TIME  
U.S. v. CHAVEZ & GALVAN; 3-12-70315 NC]